

1 AARON D. FORD
Attorney General
2 PETER E. DUNKLEY, Bar No. 11110
Deputy Attorney General
3 State of Nevada
Public Safety Division
4 100 N. Carson Street
Carson City, NV 89701-4717
5 Tel: (775) 684-1259
E-mail: pdunkley@ag.nv.gov
6

Attorneys for Defendants
7 *Sonya Carrillo, Frank Dreesen, Philip Gang,*
William Gittere, Steve Green, Judith Hebert, Jerry Howell,
8 *Michael Minev, Ronald Oliver, William Reubart,*
Bonnie Swadling, Devlin Thompson,
9 *Harold Wickham and Brian Williams*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 NATHANIEL WILLIAMS,

13 Plaintiff,

14 v.

15 WILLIAM GITTERE, et al.,

16 Defendants.

Case No. 3:18-cv-00282-MMD-CLB

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO ANSWER FOURTH-
AMENDED COMPLAINT
(First Request)**

17 Defendants, Sonya Carrillo, Frank Dreesen, Philip Gang, William Gittere, Steve Green, Judith
18 Hebert, Jerry Howell, Michael Minev, Ronald Oliver, William Reubart, Bonnie Swadling, Devlin
19 Thompson, Harold Wickham and Brian Williams, by and through counsel, Aaron D. Ford, Attorney
20 General of the State of Nevada and Peter E. Dunkley, Deputy Attorney General, hereby submit this
21 Motion for Extension of Time to Respond to Plaintiff's Fourth Amended Complaint (ECF No. 88).
22 This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of
23 Points and Authorities, and all papers and pleadings on file in this action.

24 **MEMORANDUM OF POINTS AND AUTHORITIES**

25 **I. ARGUMENT**

26 Defendants respectfully requests a four (4) day extension of time out from the current deadline
27 of March 30, 2020, to Answer the Fourth Amended Complaint (4AC) (ECF No. 88).

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1 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

2 When an act may or must be done within a specified time, the court may,
3 for good cause, extend the time: (A) with or without motion or notice if
4 the court acts, or if a request is made, before the original time or its
extension expires; or (B) on motion made after the time has expired if the
party failed to act because of excusable neglect.

5 Defendants' request is unopposed¹ and timely and its nature will not hinder or prejudice
6 Plaintiff's case, but will allow for accurate responses to Plaintiff's voluminous 4AC, weighing in at 34
7 pages, containing 13 counts alleged against 33 separate defendants.

8 In this case, there is good cause for the extension due to the Office of Attorney General's (OAG)
9 efforts to determine the status of representation of the many newly named defendants, as well as the
10 OAG's administrative adjustments related to COVID-19. The new deadline would be April 3, 2020.
11 Defendants' request is timely and, if granted, will not hinder or prejudice Plaintiff's case.

12 For these reasons, Defendants respectfully request a four (4) day extension of time from the
13 current deadline to respond to Plaintiff's 4AC, with the new deadline of April 3, 2020.

14 DATED this 30th day of March 2020.

15 AARON D. FORD
16 Attorney General

17 By: /s/ Peter E. Dunkley
18 PETER E. DUNKLEY, Bar No. 11110
Deputy Attorney General

19 *Attorneys for Defendants*

20
21 **IT IS SO ORDERED:**

22 
23 **UNITED STATES MAGISTRATE JUDGE**

24
25 **DATED:** March 31, 2020

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¹ On March 27, 2020, the undersigned conferred with Kerry Doyle, Esq., who graciously agreed not to oppose the request.

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that
3 on this 30th day of March, 2020, I caused a copy of the foregoing, **UNOPPOSED MOTION FOR**
4 **EXTENSION OF TIME TO ANSWER FOURTH-AMENDED COMPLAINT (First Request)**, to
5 be served, by U.S. District Court CM/ECF Electronic Filing on the following:

6 Kerry S. Doyle, Esq.
7 Doyle Law Office, PLLC.
8 4600 Kietzke Lane, Suite I-207
9 Reno, NV 89502

10 /s/ Caitie Collins

11 An employee of the
12 Office of the Attorney General
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